

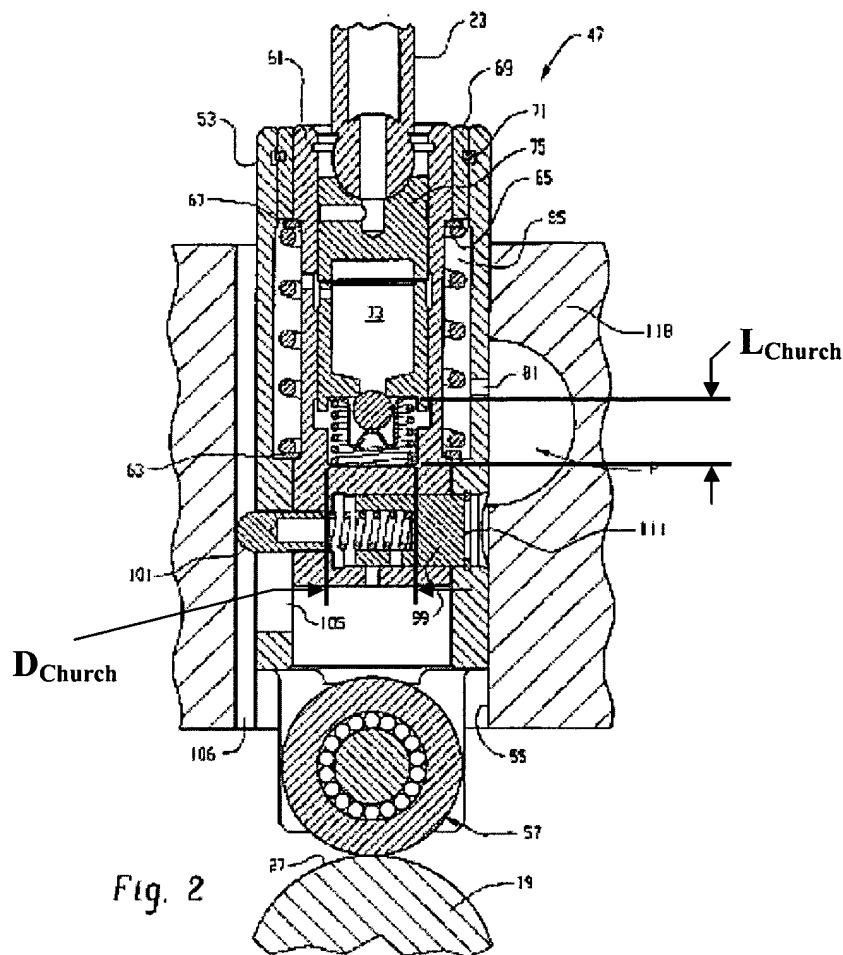
**Remarks**

Applicants respectfully request reconsideration of the present application in view of the above amendments and following remarks. No claims have been amended or cancelled. Claims 6-17 have been added. Therefore, claims 1-17 are pending in the present application.

Claims 1-15 have been rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 6,196,175 to Church ("the Church reference"). Applicants respectfully traverse this rejection.

Claim 1 is directed to a plunger return spring for use in a well in an hydraulic valve lifter wherein the well has a diameter (D) and wherein the non-compressed length (L) of the plunger return spring is greater than the diameter (D).

The Church reference does not teach or suggest a plunger return spring wherein the non-compressed length (L) of the plunger return spring is greater than the well diameter (D) as recited in claim 1. In rejecting claim 1, the Examiner stated that the non-compressed length ( $L_{\text{Church}}$ ) of the plunger return spring shown in Figure 2 of the Church reference is greater than the diameter ( $D_{\text{Church}}$ ) of the well. See *Office Action*, pg. 2. Figure 2 of the Church reference is set forth below:



The written description portion of the Church reference does not discuss the relative dimensions of  $L_{\text{Church}}$  and  $D_{\text{Church}}$ . Therefore, the only way to determine if the Church reference teaches that  $L_{\text{Church}}$  is greater than  $D_{\text{Church}}$  is to measure each of the values as they are shown in Figure 2 and then compare them to one another. Using the drawing set forth above, the measured value of  $L_{\text{Church}}$  is about 0.8 cm and the measured value of  $D_{\text{Church}}$  is about 1.1 cm. Therefore, the Church reference actually discloses that  $L_{\text{Church}}$  is less than  $D_{\text{Church}}$ . Given the measured values, the Church reference actually highlights the drawbacks and deficiencies of the prior art that the present invention intends to solve. See *Specification*, 2, lines 8-14. As

such, the Church reference does not teach or suggest all of the limitations included in claim 1. Applicants request that the rejection of claim 1 be withdrawn.

Claim 2 is directed to a pin housing sub-assembly for use in a valve deactivation hydraulic valve lifter. The sub-assembly includes a plunger return spring disposed in a well in the pin housing sub-assembly wherein the well has a diameter (D) and wherein the non-compressed length (L) of the plunger return spring is greater than the diameter (D).

For at least the same reasons set forth with respect to claim 1, the Church reference does not teach or suggest a pin housing sub-assembly wherein the non-compressed length (L) of the plunger return spring is greater than the well diameter (D) as recited in claim 2. Applicants request that the rejection of claim 2 be withdrawn. As claim 3 depends from claim 2, this claim is also not taught or suggested by the Church reference for at least the same reason set forth with respect to claim 2. Thus, Applicants request that the rejection of claim 3 be withdrawn.

Claim 4 is directed to a valve deactivation hydraulic valve lifter for use in an internal combustion engine. The valve deactivation hydraulic valve lifter comprises a pin housing sub-assembly including a plunger return spring disposed in a well in the pin housing sub-assembly. The well has a diameter (D) and the non-compressed length (L) of the plunger return spring is greater than the diameter (D).

For at least the same reasons set forth with respect to claim 1, the Church reference does not teach or suggest a pin housing sub-assembly wherein the non-compressed length (L) of the plunger return spring is greater than the well diameter

(D) as recited in claim 4. Applicants request that the rejection of claim 4 be withdrawn. As claim 5 depends from claim 4, this claim is also not taught or suggested by the Church reference for at least the same reason set forth with respect to claim 4. Thus, Applicants request that the rejection of claim 5 be withdrawn.

New claim 6 is directed to a pin housing sub-assembly for use in a valve deactivation hydraulic valve lifter. The pin housing sub-assembly includes a pin housing, a plunger return spring, a pushrod seat assembly, first and second grooves formed in the pin housing, and an expansion member disposed in the second groove. The plunger return spring is disposed in a well in the pin housing, and the plunger sub-assembly is disposed against the spring. The pushrod seat assembly is spaced apart from the plunger sub-assembly to provide a hydraulic chamber therebetween within the pin housing. The second groove is positioned between the first groove and an open end of the pin housing. The expansion member is adapted to be moved from the second groove into the first groove so that the pin housing is coupled with a spring tower during the assembly of the hydraulic valve lifter. New claims 7-13 depend from claim 6 and further define the invention set forth therein. Applicants submit that claims 6-13 are in proper form for allowance.

New claim 14 is directed to a method for assembling a pin housing sub-assembly for use in a valve deactivation hydraulic valve lifter. The pin housing sub-assembly includes a pin housing, a plunger return spring, a plunger sub-assembly, a pushrod seat assembly, an expansion ring, a first groove formed in the pin housing, and a second annular groove formed in the pin housing and positioned between the

first annular groove and an open end of the pin housing. The method includes disposing the plunger return spring in a well in the pin housing, disposing the plunger sub-assembly against the spring, spacing the pushrod seat assembly apart from the plunger sub-assembly to provide a hydraulic chamber therebetween within the pin housing, and disposing the expansion ring in the second annular groove thereby retaining the plunger return spring, the plunger sub-assembly, and the pushrod seat assembly within the pin housing to form the assembled pin housing sub-assembly. New claims 15-17 depend from claim 14 and further define the invention set forth therein. Applicants submit that claims 14-17 are in proper form for allowance.

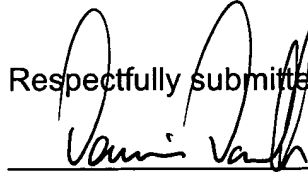
### **Conclusion**

In light of the foregoing, Applicants submit that claims 1-17 are in condition for allowance and such allowance is respectfully requested. Should the Examiner feel that any unresolved issues remain in this case, the undersigned may be contacted at the telephone number listed below to arrange for an issue resolving conference.

The Commissioner is hereby authorized to charge the \$120.00 required for the one-month extension of time, the \$400.00 fee for the two additional independent claims added in excess of three, and any other fee that may have been overlooked to Deposit Account No. 10-0223.

Dated: 4/7/05

Respectfully submitted,



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first annular groove and an open end of the pin housing. The method includes disposing the plunger return spring in a well in the pin housing, disposing the plunger sub-assembly against the spring, spacing the pushrod seat assembly apart from the plunger sub-assembly to provide a hydraulic chamber therebetween within the pin housing, and disposing the expansion ring in the second annular groove thereby retaining the plunger return spring, the plunger sub-assembly, and the pushrod seat assembly within the pin housing to form the assembled pin housing sub-assembly. New claims 15-17 depend from claim 14 and further define the invention set forth therein. Applicants submit that claims 14-17 are in proper form for allowance.

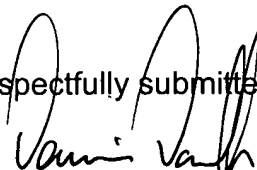
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